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Counsel for Defendant O'CONNOR



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR-11-814 JW
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	TO CONTINUE SENTENCING DATE
v.)	
)	Current Date: March 5, 2012, at 1:30 p.m.
ROBIN O'CONNOR,)	Proposed Date: March 26, 2012, at 1:30 p.m.
)	
Defendant.)	
)	
_____)	

Ms. O'Connor pled guilty to one count of wire fraud on November 14, 2011. On that date, her sentencing hearing was scheduled for March 5, 2012. The parties now jointly request a continuance of that date to March 26. There is good cause for the continuance because government counsel is currently in a lengthy trial that will not end until March. This is a complicated case and the parties believe it is important to ensure continuity of government counsel. In addition, because of his trial schedule, a continuance is necessary for government counsel to adequately respond to the pre-sentence report and file a sentencing memo. This is the first continuance that the parties have requested and Ms. O'Connor will not be prejudiced by the continuance. She is out of custody and has been in compliance with all of her conditions of release. Defense counsel, government counsel, and the probation officer are all available for sentencing on March 26.

1 The parties additionally request that the briefing schedule be amended as follows:

2 Objections to PSR due: March 6

3 Final PSR due: March 12

4 Sentencing Memoranda due: March 19

5 Sentencing Replies (if necessary) due: March 22

6
7 SO STIPULATED.

8 DATED: 2/17/12

/s/

9
10 RITA BOSWORTH

Assistant Federal Public Defender

11
12 DATED: 2/17/12

/s/

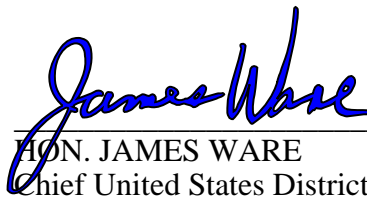
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14 THOMAS STEVENS

Assistant United States Attorney

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16 The Court hereby ORDERS that the defendant's sentencing hearing is continued to
17 March 26, 2012, at 1:30 p.m. The Court further orders that the amended briefing schedule
18 proposed by the parties shall be adopted.

19
20
21 February 21, 2012

DATE


HON. JAMES WARE

Chief United States District Judge